

2022 NOV -1 PM 10:49

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
LUBBOCK DIVISION

UNITED STATES OF AMERICA

v.

J. NICHOLAS BRYANT

DEPUTY CLERK  
5-22-CR-0099-H  
No. \_\_\_\_\_

INFORMATION

The United States Attorney charges:

Scheme and Artifice to Defraud

1. **J. Nicholas Bryant** perpetrated a scheme and artifice to defraud and attempt to defraud a number of individuals and business entities, including unsuspecting individuals, car dealerships, air charter service companies, and a yacht services company, among others. He did so to fraudulently obtain expensive vehicles, charter flights, yacht cruises, rental of vacation homes, and other goods and services from unsuspecting victims.

Manner and Means of the Scheme to Defraud

To accomplish his scheme and artifice to defraud:

2. **J. Nicholas Bryant** used counterfeit checks and manipulated online payment platforms, including Veem and QuickBooks Payments, to convince the victims that payment for items and services was forthcoming. **J. Nicholas Bryant** very well knew that the payments would fail because he did not have money to fund the payments.

3. After the payments failed and the victims were left without compensation, **J. Nicholas Bryant** provided promises of payment through other means, but never made payment and eventually ceased communications with the victims.

Count One  
Wire Fraud  
(Violation of 18 U.S.C. § 1343)

The United States Attorney realleges and incorporates the allegations in paragraphs one through three of this Information as though fully set forth herein. On or about November 18, 2021, in the Lubbock Division of the Northern District of Texas and elsewhere, **J. Nicholas Bryant**, defendant, having devised and intending to devise a scheme and artifice to defraud and obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, did knowingly and with specific intent to defraud transmit and cause to be transmitted by wire communication in interstate and foreign commerce a writing, sign, signal, picture, and sound; that is, **J. Nicholas Bryant** sent a text message from Lubbock to a representative of Sales Hangar Flight Ops, LLC, in Jonesboro, Arkansas, indicating that a non-existent person, his “secretary,” would pay an invoice totaling \$38,000 for charter flights departing Lubbock to Houston, Texas, and continuing to Miami, Florida.

All in violation of Title 18, United States Code, Section 1343.

Forfeiture Notice

18 U.S.C. § 981(E); 18 U.S.C. § 982(a)(2)(A); 28 U.S.C. § 2461(c)

1. The allegations contained in Count One of this information are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. § 981(E); 18 U.S.C. § 982(a)(2)(A); and 28 U.S.C. § 2461(c).

2. Upon conviction of the offense in violation of 18 U.S.C. § 1343 set forth in Count One, the defendant, **J. Nicholas Bryant**, shall forfeit to the United States of America, pursuant to 18 U.S.C. § 981(E); 18 U.S.C. § 982(a)(2)(A); and 28 U.S.C. § 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense.

3. If any of the property described above, as a result of any act or omission of the defendant:

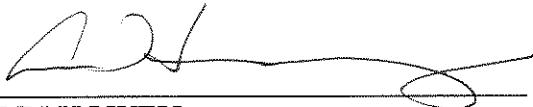
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

All pursuant to 18 U.S.C. § 981(E); 18 U.S.C. § 982(a)(2)(A); and 28 U.S.C. § 2461(c).

**J. Nicholas Bryant**  
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